

THE HONORABLE JAMES L. ROBERT

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

KATHERINE MOUSSOURIS, HOLLY
MUENCHOW, and DANA PIERMARINI,
on behalf of themselves and a class of
those similarly situated,

Plaintiffs,

v.

MICROSOFT CORPORATION

Defendant.

Case No. 2:15-cv-01483-JLR

**DECLARATION OF MICHELLE LAMY
IN SUPPORT OF PLAINTIFFS'
OPPOSITION TO MICROSOFT'S
MOTION FOR SUMMARY JUDGMENT**

1 I, Michelle Lamy, declare:

2 1. I am an attorney at Lief Cabraser Heimann & Bernstein, LLP (“LCHB”),
3 attorneys for Plaintiffs and the proposed class in the above-captioned class action. I make these
4 statements based on personal knowledge and would so testify if called as a witness.

5 2. This Declaration is submitted in support of Plaintiffs’ Opposition to
6 Microsoft’s Motion for Summary Judgment.

7 3. I am a member in good standing of the bar of California, and have been
8 admitted to this case *pro hac vice*.

9 **Production Documents**

10 4. Attached hereto as **Exhibit A** are true and correct copies of documents
11 cited in Plaintiffs’ brief that Microsoft produced in this litigation. These documents are provided
12 in this collective Exhibit A in numerical order by Bates Number. At the beginning of Exhibit A,
13 its contents are listed by the beginning Bates Number of each document.

14 5. Attached hereto as **Exhibit B** are true and correct copies of documents
15 cited in Plaintiffs’ brief that Plaintiffs produced in this litigation. These documents are provided
16 in this collective Exhibit A in numerical order by Bates Number. At the beginning of Exhibit B,
17 its contents are listed by the beginning Bates Number of each document.

18 **Deposition Transcripts**

19 6. Attached hereto as **Exhibit C** is a true and correct copy of excerpts from
20 the deposition of Katie Moussouris, dated June 10, 2016.

21 7. Attached hereto as **Exhibit D** is a true and correct copy of excerpts from
22 the deposition of Holly Muenchow, dated June 22, 2016.

23 8. Attached hereto as **Exhibit E** is a true and correct copy of excerpts from
24 the deposition of Dana Piermarini, dated June 9, 2016.

25 9. Attached hereto as **Exhibit F** is a true and correct copy of excerpts from
26 the deposition of John Ritchie, Corporate Vice President of Total Rewards, dated June 29 and 30,
27 2016.

Miscellaneous

10. Attached hereto as **Exhibit G** is a true and correct copy of a Charge of Discrimination filed by Plaintiff Dana Piermarini on June 9, 2017.

11. Attached hereto as **Exhibit H** is a true and correct copy of the Amended Charge of Discrimination filed by Plaintiff Dana Piermarini on April 2, 2018.

12. Attached hereto as **Exhibit I** is a true and correct copy of the LinkedIn profile of [REDACTED], printed on April 2, 2018.

* * *

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge and that this declaration was executed in New York, New York on April 2, 2018.

s/ Michelle Lamy
Michelle Lamy

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing and all documents attached hereto were served April 2, 2018 upon counsel of record via service by ECF.

s/ *Michelle Lamy*
Michelle Lamy